

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
EASTERN DIVISION**

SERVICIOS FUNERARIOS GG, S.A. DE C.V.,

Case No. 23-cv-10684

Plaintiff / Counter-Defendant,

v.

Oral Argument Requested

ADVENT INTERNATIONAL CORPORATION,

Defendant / Counter-Plaintiff.

**SERVICIOS FUNERARIOS GG, S.A. DE C.V.'S
MOTION FOR SANCTIONS AGAINST
ADVENT INTERNATIONAL CORPORATION AND ITS COUNSEL**

Plaintiff Servicios Funerarios GG, S.A. de C.V. ("SF") moves for the issuance of sanctions against Advent International Corporation ("AIC") and its counsel, Quinn Emanuel Urquhart & Sullivan, LLP and Ropes & Gray LLP pursuant to Fed. R. Civ. P. 11(b)(1) and (3). As is more fully described in the accompanying supporting memorandum of law, the specific conduct that violates Rule 11 is: the assertion of unsupported factual contentions in AIC's Answer and Counterclaim (Doc. 14) that SF and its Mexican criminal counsel engaged in corrupt conduct in Mexico in connection with the Mexican Criminal Action, the filing of claims against SF based on those allegations, and the filing of the Counterclaim for improper purposes.

Dated: March 22, 2024

Respectfully submitted,

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*Indicates attorney admitted *pro hac vice*

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was served on all counsel of record via electronic mail on the date below pursuant to Rule 5 and Rule 11(c)(2).

Date: March 22, 2024

By: /s/ Carlos M. Sires
Carlos M. Sires

CERTIFICATE OF CONFERRAL

I certify that a copy of the foregoing document was served on all counsel of record via electronic mail on March 22, 2024 pursuant to Rule 5 and Rule 11(c)(2). Pursuant to Rule 7.1, I asked AIC to confer during the safe harbor period. As of April 22, 2024, I have not received a response.

Date: April 22, 2024

By: /s/ Carlos M. Sires
Carlos M. Sires

CERTIFICATE OF SERVICE

I, Carlos M. Sires, hereby certify that the above was filed through the ECF system and that I have caused a true and correct copy of the above to be served on Plaintiff's counsel.

Date: April 22, 2024

By: /s/ Carlos M. Sires
Carlos M. Sires